

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

LESTER LEE,

PLAINTIFF

v.

BROOKSIDE PARK CONDOMINIUM,  
INC., METROPOLIS (aka MCM, INC.),  
RAMMY AZOULAY AND LAMONT  
SAVOY

DEFENDANTS

Case No. 8:24-cv-01205-TJS

**DEFENDANTS BROOKSIDE PARK CONDOMINIUM, INC., METROPOLIS (aka  
MCM, INC.), AND RAMMY AZOULAY'S FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS TO PLAINTIFF**

**TO:** Lester Lee, Plaintiff

**FROM:** Brookside Park Condominium, Inc., Metropolis (aka MCM, Inc.), and Rammy  
Azoulay, Defendants

Defendants, Brookside Park Condominium, Inc., (hereinafter "Defendant Brookside")  
Metropolis (aka MCM, Inc.) (hereinafter "Defendant Metropolis"), and Rammy Azoulay  
(hereinafter "Mr. Azoulay"), by and through their attorneys Anthony D. Dwyer and Eccleston and  
Wolf, P.C., pursuant to Rule 34 of the Federal Rules of Civil Procedure, hereby requests that you  
produce the following documents for inspection, examination and copying by this Defendant and  
its attorneys, at the Law Offices of Eccleston and Wolf, P.C. Baltimore-Washington Law Center,  
7240 Parkway Drive, 4th Floor, Hanover, MD 21076, within thirty (30) days after service of this



Request for Production of Documents, or at such other time and place as counsel for the parties may agree.

### **INSTRUCTIONS**

(a) In accordance with FRCP 34(b), your written response shall state, with respect to each item or category, that inspection and related activities will be permitted as required, unless the request is refused, in which event the reasons for refusal shall be stated. If the refusal relates to part of an item or category, the part shall be specified and inspection permitted of the remaining parts.

(b) In accordance with FRCP 34(b), the documents shall be produced as they are kept in the usual course of business, or you shall organize and label them to correspond with the categories of the request.

(c) Pursuant to FRCP 34(a), these requests encompass all items within your possession, custody or control.

(d) If in responding to these requests you encounter any ambiguity in construing any request, instruction or definition, set forth the matter deemed ambiguous and the construction used in responding.

(e) If you claim privilege, qualified work-product immunity, or decline to provide documents as requested on the basis of some other objection, you shall list in your written response to this Request all such documents, in chronological order, setting forth as to each of the following:

- (1) Date;
- (2) Author(s);
- (3) Addresses;
- (4) Title;
- (5) Type of document (*e.g.*, letter, report, memorandum, etc.);

- (6) Subject matter (without revealing the information as to which privilege or immunity is claimed;
- (7) Basis for the claimed privilege, immunity or objection; and/or
- (8) Identify all persons to whom copies of such documents were sent.

(f) If any document responsive to this request was, but no longer is, in your possession, custody or control, please furnish a description of each such document, state the manner and circumstances under which it left your possession, custody or control, and the document's present whereabouts, if known.

### **DEFINITIONS**

As used in these requests, the following terms are to be interpreted in accordance with these definitions:

(a) The term “person” includes any individual, joint stock company, unincorporated association or society, municipal or other corporation, the State, its agencies or political subdivisions, any court, or any other governmental entity.

(b) The terms “you” and “your” include the person(s) to whom these requests are addressed, and all of that person’s agents, representatives, or attorneys.

(c) In accordance with FRCP (a), the terms “document” and “documents” include all writings, drawings, graphs, charts, photographs, phonorecords and other data compilations from which information can be obtained, translated if necessary, by you through detection devices into reasonably usable form.

(d) The term “Complaint” as used herein refers to the operative Complaint in this case.

(e) As used herein, all references to the singular include the plural, and all plural references include the singular.

**REQUESTS FOR PRODUCTION**

**REQUEST NO. 1:** All documents identified in your Answers to Defendants Brookside, Metropolis, and Mr. Azoulay's Interrogatories.

**REQUEST NO. 2:** Any and all documents relied upon to answer Defendants Brookside, Metropolis, and Mr. Azoulay's Interrogatories.

**REQUEST NO. 3:** All documents provided to, received from or that constitute, memorialize, refer or relate to any communications with Defendants Brookside, Metropolis, and Mr. Azoulay's relating to the events subject to the Complaint.

**REQUEST NO. 4:** All documents referring or relating to any admissions or statements made by Defendants Brookside, Metropolis, and Mr. Azoulay or its employees, agents or representatives, regarding any matters complained of in the Complaint.

**REQUEST NO. 5:** If not already provided, all written or recorded statements of any party or its/his/her agents concerning the subject matter of this action.

**REQUEST NO. 6:** All documents referring or relating to any statements made by any individual with personal knowledge of facts related to the allegations in the Complaint.

**REQUEST NO. 7:** All documents in support of Plaintiff's claims for damages, including, but not limited to, the claims in Paragraphs 33, and 61 of the Complaint for mental anguish, loss of dignity, emotional distress, humiliation, and loss of your right to equal housing opportunities regardless of disability.

**REQUEST NO. 8:** All documents which relate to any person whom you intend to call at the trial of this matter as an expert witness, including CVs, written reports, retainer agreements, documents provided to, or prepared by any such expert, communications, bills and time records.

**REQUEST NO. 9:** All notes, diagrams, photographs, or other documents prepared or reviewed in connection with his or her assignment in this case by each person whom you expect to call as an expert witness at trial.

**REQUEST NO. 10:** All documents constituting or relating to communications between you, or any of your agents, servants, employees, or attorneys, and any expert expected to testify at the trial in this case.

**REQUEST NO. 11:** A copy of all documents relating to any criminal action in which you were the Defendant within the past fifteen (15) years.

**REQUEST NO. 12:** All documents concerning any release, settlement, and/or other agreement, formal or informal, pursuant to which the liability of any person for any damage arising out of the subject matter of this lawsuit has been limited, reduced, or released in any manner.

**REQUEST NO. 13:** All photographs, videotapes, audiotapes, diagrams, surveys, or other graphic representations of information concerning any issue related to the subject matter of this lawsuit.

**REQUEST NO. 14:** All documents relating to, referring to, evidencing, and/or recording any and all communications regarding any issues you raised in the Complaint, including, but not limited to, meetings, telephone calls, text messages, notes, letters, faxes, and/or emails, between you and anyone else, in any way, related to your request for a reasonable accommodation with Defendants Brookside, Metropolis, and Mr. Azoulay.

**REQUEST NO. 15:** All memoranda, notes, telephone records, logs, journals, diaries, calendars, reports, files or records relating to the subject matter of this litigation.

**REQUEST NO. 16:** All documents concerning, evidencing, or relating to the name and address of every hospital, rehabilitation facility, or any other medical provider and/or healthcare facility where you were admitted and/or received treatment for the past ten (10) years, the nature and/or purpose of the medical treatment, examination and/or consultation and the date(s) or approximate date(s), of such treatment, examination and/or consultation.

**REQUEST NO. 17:** All documents which support the allegations you make in ¶8 of your complaint, that Defendants Brookside, Metropolis, and Mr. Azoulay personally implemented and enforced a discriminatory denial of a request for accommodation you requested. Including but not limited to the dates, times, manner, and names of all people who implemented and enforced such denial of your request.

**REQUEST NO. 18:** All documents which support the allegations you make in ¶9 of your Complaint, that Defendants Brookside, Metropolis, and Mr. Azoulay have a pattern of discriminating against persons with disabilities who reside at the premises. Including but not limited to the names, address, contact information, and specific dates of such alleged discrimination of other residents you claim Defendant Brookside, Metropolis, and Azoulay have discriminated against.

**REQUEST NO. 19:** All documents that support the assertion you make in ¶13 of your Complaint that the alleged service animals named MaMa and Cashmere are trained to provide both psychiatric and emotional support, physical support, detect seizures, low blood pressure, low blood sugar levels. Including but not limited to the date of such training each dog received, the name of the person(s) or business(es) that trained each dog, the contact information and address for each individual who trained the dog, and all certificates that show each dog is qualified to be either an emotional support animal and/or service animal.

**REQUEST NO. 20:** All documents that support the assertion you make in ¶26 of your Complaint that you provided reliable verification of your handicap and disability-related need for an accommodation to Defendants Brookside, Metropolis, and Mr. Azoulay.

**REQUEST NO. 21:** All documents that support the assertion you make in ¶28 of your Complaint that failure of Defendants Brookside, Metropolis, and Mr. Azoulay, to modify its policies to accommodate your disabilities is discriminatory and unlawful.

**REQUEST NO. 22:** All documents that support the assertion you make in ¶30 of your Complaint that the conduct and acts of Defendants Brookside, Metropolis, and Azoulay constituted as discrimination under 42 U.S.C. § 3604(f)(2), (f)(3)(b), FHA.

**REQUEST NO. 23:** All documents that support the assertion you make in ¶31 of your Complaint that Defendant Brookside, Metropolis, and Mr. Azoulay, violated 42 U.S.C. § 3604(f), FHA and that such accommodations you sought are necessary to afford you an equal opportunity to use and enjoy the dwelling you are renting.

**REQUEST NO. 24:** All documents that support the assertion you make in ¶32 of your Complaint that if Defendants Brookside, Metropolis, and Mr. Azoulay was to provide an accommodation of their pet rule would not (1) result in substantial physical damage to the property of others, (2) pose an undue financial burden, or (3) fundamentally alter Defendant Brookside Park Condominium, Inc.'s operations.

**REQUEST NO. 25:** All documents that show, you were investigated by the Prince George's County Police Department in connection to an attack by one of your pit bulls on another unit owners' dog, in which such attack killed the dog.

**REQUEST NO. 26:** All documents that show you were required to and did take one of your Pitbulls to the Animal Humane Society in Alexandria, Virginia to be put down.

**REQUEST NO. 27:** All documents that reference or concern any medical treatment you received in connection to one of your pit bulls who attacked you, causing lacerations to your face. Including but not limited to the names, address, contact information, and any and all medications or treatments that were prescribed to you from such medical professionals.

**REQUEST NO. 28:** All documentation that relates to any anti-depressant and/or anti-anxiety medication you have either taken and/or are currently taken, and, if so, state the date(s) on which you commenced taking these medications, whether you are currently taking these medications, the diagnosis or condition for which you are taking these medications, whether the medications were prescribed, and, if so, the name of the prescriber.

**REQUEST NO. 29:** All documents that support Count V. of your Complaint against Defendant Metropolis for Respondent Superior.

**REQUEST NO. 30:** All documents that support Count VI. Of your Complaint against Defendant Metropolis for Negligent Retention.

**REQUEST NO. 31:** All documents that show Defendant Metropolis failed to retain safe and competent employees.

**REQUEST NO. 32:** All documents for any and all prior claims or lawsuits you have ever filed, including but not limited to workers compensation claims, please state you:

- a) the date and place of the accident or occurrence;
- b) the nature of each accident or occurrence and the nature, extent, and duration of all injuries sustained;
- c) the names, addresses and phone numbers of all physicians, hospitals and/or health care facilities who treated you as a result of such accident, occurrence, illness or medical condition;



- e) whether you continue to suffer any ill effects or problems as a result of such accident, occurrence, illness or medical condition, and, if so, the nature of your continuing problem;
- f) whether a claim was made with any insurance company, the name of the insurance company, claim number, and if any settlement was made;
- g) whether a suit was filed, the court in which it was filed and the case law number, and the attorney who represented you.

**REQUEST NO. 33:** All documents that show you whether you received an honorable or dishonorable discharge from the United States Army. Including but not limited to the date, time, and manner such discharge was provided to you and the reason for such discharge.

**REQUEST NO. 34:** A copy of the lease agreement between you and Defendant Charles Lamont Savoy.

**REQUEST NO. 35:** A copy of your Maryland State driver's license or any other form of identification that you possess.

**REQUEST NO. 36:** All documentation concerning any civil lawsuit that has been filed against you or is currently pending within the past ten (10) years. Including but not limited to the date, time, location, such case was filed or is currently pending, the name of your attorney, and the disposition or current status of such case.

**REQUEST NO. 37:** A copy of all statements previously made by you concerning the subject matter of the lawsuit, including any written statement signed or otherwise adopted or approved by the Plaintiff concerning the subject matter of this lawsuit, including any written statement, signed or otherwise adopted or approved by either Plaintiff hereto and any stenographic, mechanical, electrical, or other type of recording or any transcription thereof made contemporaneously recorded by the Plaintiff herein.

**REQUEST NO. 38:** A copy of all statements previously made by Defendants Brookside, Metropolis, and Mr. Azoulay concerning the subject matter of the lawsuit, including any written statement signed or otherwise adopted or approved by Defendants Brookside, Metropolis, and Mr. Azoulay concerning the subject matter of this lawsuit, including any written statement, signed or otherwise adopted or approved by either Defendants Brookside, Metropolis, and Mr. Azoulay hereto and any stenographic, mechanical, electrical, or other type of recording or any transcription thereof made contemporaneously recorded by the Defendant herein.

**REQUEST NO. 39:** Notes, worksheets, test data, reports, correspondence, memorandums, opinions, and conclusions of all expert witnesses who will or may testify on behalf of the Plaintiff.

**REQUEST NO. 40:** Copies of any treatise, standards in the industry, legal authority, rule, case, state, local, county, municipality, or federal statute, or federal regulations, or code that will be relied upon during this matter.

**REQUEST NO. 41:** A copy of all documents that you intend to introduce at trial.

**REQUEST NO. 42:** Any documents received pursuant to a subpoena request.

Respectfully submitted,

/s/Anthony D. Dwyer \_\_\_\_\_  
Anthony D. Dwyer (415575)  
ECCLESTON & WOLF, P.C.  
Baltimore-Washington Law Center  
7240 Parkway Drive, 4th Floor  
Hanover, MD 21076-1378  
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(410) 752-0611 (fax)  
E-mail: [dwyer@ewva.com](mailto:dwyer@ewva.com)  
Attorney for Defendants

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 14<sup>th</sup> day of August, 2024, copies of the foregoing  
**DEFENDANTS BROOKSIDE PARK CONDOMINIUM, INC., METROPOLIS (aka  
MCM, INC.), AND RAMMY AZOULAY'S FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS TO PLAINTIFF** were served by first-class mail, postage prepaid to:

Richard Bruce Rosenthal, Esq.  
545 E. Jericho Turnpike  
Huntington Station, NY 11746  
631.629.8111 (Phone  
[richard@thedoglawyer.com](mailto:richard@thedoglawyer.com)  
*Pro Hac Vice*

/s/Anthony D. Dwyer  
Anthony D. Dwyer (415575)